

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON INC
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBITS:

JOINT MOTION TO DISMISS WITHOUT PREJUDICE

Plaintiffs in the cases listed on the attached Exhibits A-C and defendant American Medical Systems, Inc., (“AMS”) jointly move the court to dismiss AMS without prejudice and terminate them from the docket of the court, parties to bear their own costs. Other defendants remain in this action, and plaintiffs will continue to pursue this action against them.

Respectfully:

/s/ Barbara Binis

Barbara Binis
Stephen J. McConnell
REED SMITH
Three Logan Square, Suite 3100
1717 Arch Street
Philadelphia, PA 19103
215.851.8100 (phone)
215.851.1420 (fax)
bbinis@reedsmith.com
smcconnell@reedsmith.com

/s/ Erik W. Legg

Erik W. Legg
FARRELL WHITE & LEGG
P. O. Box 6457
Huntington, WV 25772-6457
304.522.9100 (phone)
304.522.9162 (fax)
EWL@farrell3.com

Attorneys for Defendant American Medical Systems, Inc.

/s/ Karolina S. Kulesza
Karolina S. Kulesza
DRIGGS BILLS & DAY
331 South 600 East
Salt Lake City, UT 84102
801.363.9982 (phone)
801.931.2552 (fax)
kkulesza@lawdbd.com
Attorney for Plaintiffs on Exhibit A

/s/ Michael Gallant
Michael Gallant
KELLEY BERNHEIM & DOLINKSY
Fourth Floor
2200 Pennsylvania Avenue, NW
Washington, DC 20037
202.379.0680 (phone)
202.379.0685 (fax)
mgallant@duejustice.com
Attorney for Plaintiffs on Exhibit B

/s/ Babak Bobby Saadian
Babak Bobby Saadian
WILSHIRE LAW FIRM
12th Floor
3055 Wilshire Boulevard
Los Angeles, CA 90010
213.381.9988 (phone)
213.381.9989 (fax)
masstorts@wilshirelawfirm.com
Attorney for Plaintiff on Exhibit C

Dated: April 3, 2019

EXHIBIT A – DRIGGS BILLS & DAY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-cv-12541	Priscilla Cruz v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:15-cv-14339	Marlene Grieff v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:15-cv-14404	Lisa M. Sa'u, Bradlee M. Sa'u v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:16-cv-06210	Nell Christine Higgs, Michael Higgs v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT B – KELLEY BERNHEIM & DOLINKSY

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:15-cv-14824	Mary Rose, Harold Lee Rose v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

EXHIBIT C – WILSHIRE LAW FIRM

CIVIL ACTION NUMBER (listed numerically in ascending order)	CASE NAME
2:16-cv-06344	Glenda Baker v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on April 3, 2019, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/ Barbara R. Binis